



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

August 12, 1997

Mr. James E. Rasmussen  
U.S. Department of Energy  
Richland Operations Office  
P.O. Box 550, MSIN: A5-15  
Dear Mr. Rasmussen:

Re: 303-K Storage Facility Closure Plan Revised Sampling and Analysis Plan (SAP)

The Department of Ecology (Ecology) has reviewed the 303-K Storage Facility SAP(HNF-SD-ENV-AP-005, revision 0, July 1997) and the Errata sheet transmitted on August 1, 1997. The SAP and Errata sheet will modify the 303-K Storage Facility Closure Plan (DOE-RL 1995a) incorporated into the Hanford Dangerous Waste Permit (Permit). The SAP and Errata sheet will supersede the SAP contained in the 1995a version of the closure plan.

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Enclosed you will find Permit conditions which amend the SAP, as submitted. The SAP, Errata sheet, and the unit specific conditions will become enforceable provisions of the Permit. As requested, the existing Permit condition, V .14. B. f., will be modified to extend the time allowed for closure until September 30, 1998. The SAP will be included in the Permit as part of Modification C: the public comment period will begin in August 1997.

If you have any questions regarding this transmittal, please contact me at (509) 736-3019.

Sincerely,

Jeanne Wallace  
300 Area Project Manager  
Nuclear Waste Program

JW:skr

Enclosures (Permit Conditions)

cc: Ellen Mattlin, USDOE  
Mark Hahn, USDOE  
David Einan, EPA  
Jason Adler, WMH  
John Remaize, BWHC  
Fred Ruck III, FDH  
Administrative Record: 303-K Alkali Metal Storage Facility  
Administrative Record: 300-F-2 Operable Unit



V.14.B. AMENDMENTS TO THE APPROVED CLOSURE PLAN

V.14.B.f. The allowed time for closure is hereby extended in accordance with WAC 173-303-610(4)(b)(i). The Permittees shall submit a certification of closure for 303-K no later than September 30, 1998.

V.14.B.g. Compliance with the approved Sampling and Analysis Plan

The Permittees shall comply with all the requirements set forth in the "303-K Storage Facility Sampling and Analysis Plan", as found in Attachment 39, and the "Errata Sheet for the 303-K Storage Facility Sampling and Analysis Plan," as found in Attachment 40 including the amendments specified below. All subsections, figures, and tables included in the Sampling and Analysis Plan also are enforceable unless otherwise stated.

V. 14.B.g.1. Section 5.1 Cleanup Performance Standards for Soils

Insert the following after line 25 on page 5: "Using the Ecology publication, Model Toxics Control Act Cleanup Levels and Risk Calculations (CLARC II) Update, February 1996 (Publication #94-145, as updated 1/96), cleanup levels shall be identified for all constituents of concern. In addition, when a MTCA Method B value does not exist for a constituent, the cleanup level shall be obtained from the appropriate Method A table in WAC 173-340."

Delete Table 1 on page 6.

V.14.B.g.2. Section 7.4 Support for Ecology during Sampling

Delete lines 29 through 32 on page 16 ("Split samples of concrete and soil may be collected, if requested, for Ecology. If split samples for Ecology are collected as part of this sampling effort, then the...") and replace with the following: "Split samples of concrete and soil will be collected for Ecology from each sampling location. The..."

V.14.B.g.3. Field analytical quality control will include analytical duplicate(s) and verification of the method detection limit. Each field screening analytical duplicate sample will be collected from the same volume of sample material as the original field screening analytical sample. The frequency for these duplicates will be one per 20 samples or one per day of analysis, whichever is more stringent. The procedure used for the verification of the method detection limit is subject to approval by Ecology.

V.14.B.g.4. The laboratory quality control will be performed as described in the respective method, but will include the following: The frequency for analytical quality control will be one in 20 samples or one per analytical batch, whichever is more stringent, for duplicate and spike (or matrix spike) samples. Samples from this project must be chosen for the duplicate and spike (or matrix spike) samples. At least one method blank and one quality control check sample will be performed for each analytical batch.

V.14.B.g.5. Samples shall be placed immediately upon ice or refrigerated to  $4 \pm 2$  degrees Celsius after sampling and held at that temperature prior to and during shipping to the analytical laboratory.

V.14.B.g.6. Loss of any sample due to any cause may require resampling and/or reanalysis, at the discretion of the Department.

- V.14.B.g.7. The results of all analyses required by the Sampling and Analysis Plan as revised by these conditions shall be provided to the Department as stated in V.14.B.c. In addition to the items listed, these submittals shall include calibration and quality control data. A data evaluation report shall be submitted to the Department comparing the analytical results to the cleanup levels for the 303-K, derived as described in Condition V.14.B.g.1. For data to be useable for this comparison, the method quantification limit for the constituent must be equal to or less than the cleanup level, or the method detection limit must be at least ten times below the cleanup level, and the data package must be complete.
- V.14.B.h. If any analytical result for any sample specified in the Sampling and Analysis Plan exceeds the MTCA Method B cleanup level, then characterization of the lateral and vertical extent of the contamination shall be required and the Department shall pursue corrective action for this TSD unit.